

FILED

UNITED STATES DISTRICT COURT

MAY 14 2008

NR

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

v.

CASE NUMBER:

MAGISTRATE JUDGE ASHMAN

AHMAD ALI AHMAD

08CR 384

I, Bryan Watson, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 6, 2008 in Cook County, in the Northern District of Illinois defendant(s) did, (Track Statutory Language of Offense)

by force and violence, and intimidation, take from the person and presence of bank employees at TCF Bank, 6410 W. 127th Street, Palos Heights, Illinois, approximately \$175,000 in United States Currency belonging to and in the care, custody, control, management, and possession of TCF Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation,

in violation of Title 18 United States Code, Sections 2113(a) and 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

Official Title

See attached affidavit.

Continued on the attached sheet and made a part hereof: X Yes No

B.K. Watson
Signature of Complainant

Sworn to before me and subscribed in my presence,

May 14, 2008
Date

at

Chicago, Illinois
City and State

Martin C. Ashman, United States Magistrate Judge
Name & Title of Judicial Officer

Martin C. Ashman
Signature of Judicial Officer

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

I, Bryan K. Watson, being duly sworn depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and have been so employed since 2004. My duties include the investigation of various violent crimes, to include bank robberies, in violation of Title 18, United States Code, Section 2113.

2. The information contained in this affidavit is based upon personal knowledge from my participation in this investigation, reports I have read related to this investigation, conversations I have had with others who have knowledge of the events and circumstances described herein, and interviews of bank employees and witnesses. The information below is provided for the limited purpose of establishing probable cause that, on or about May 6, 2008, AHMAD ALI AHMAD by force, violence or intimidation, took from the person and presence of bank employees, approximately \$170,000 in United States Currency belonging to and in the care, custody, control, management, and possession of the TCF Bank branch office located at 6410 West 127th Street, Palos Heights, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113 (a); and Title 18 United States Code, Section 2. This affidavit does not contain all the facts of which I am aware related to this investigation.

Robbery of the TCF Bank, 6410 West 127th Street, Palos Heights

3. On May 6, 2008, the FBI received notice that TCF Bank, a financial institution insured by the Federal Deposit Insurance Corporation, located at 6410 West 127th Street, Palos Heights, Illinois, was robbed by two armed men.

4. Following the robbery, FBI agents and the Palos Heights law enforcement officers interviewed two tellers (Tellers A and B) and a security guard who were present

during the TCF Bank robbery. These witnesses stated that, at approximately 6:30 p.m. on May 6, 2008, two adult males wearing masks and dark clothing (Robbers A and B) entered the bank. Robber A carried a long gun, and Robber B carried a .38 caliber revolver. Robber B proceeded directly to the security guards station and forced the guard to lie on the ground. Robber A approached the teller counter, jumped over the counter, and ordered the tellers at gunpoint to take him into the bank's money vault. After the tellers led Robber A into the vault, Robber A handed a white plastic bag to Teller A and ordered Teller B to place the money from the vault into the bag. Teller B filled the bag with money from the vault. After the bag was full of money, Robber A took the bag, which contained approximately \$170,000 of United States Currency.

5. According to witnesses, Robber B then ordered the security guard at gunpoint into the vault area. After the security guard was brought into the vault area, Robbers A and B instructed the tellers and the security guard to count for either three minutes or to 300. The robbers then exited the bank.

6. FBI agents and Palos Heights law enforcement officers interviewed Witness A, who lives near the bank. Witness A stated, at approximately 6:30 p.m., Witness A observed a white female, Robber C, seated in the driver's seat of a red Volkswagen Jetta, which was parked adjacent to his residence on 126th Place near Ridgeland Ave. According to Witness A, the red Jetta was parked on the street between his house and the adjacent residence which leads from the TCF parking lot to 126th Place. Witness A thought this was very suspicious and thought the TCF Bank was possibly being robbed and the red Jetta may be involved.

7. Witness A went inside of his residence to record the license plate number to the Jetta. The Witness stated the license plate number was X516510. After recording the license plate number, Witness A went back outside and observed the Jetta speed away with Robber C driving and what appeared to be a male in the front seat slouching.

Identification of Driver, Viktoria Malukaite

8. A query of the State of Illinois Vehicle Registration revealed license plate number X516510 is registered to Viktoria Malukaite¹. Law enforcement officers located Malukaite and the Palos Heights Police Department took her into custody. After Malukaite was informed of her *Miranda* rights, Malukaite agreed to waive her rights and agreed to speak with law enforcement. Affiant was present during the interview. During the interview, Malukaite confessed to being involved in the robbery of the TCF bank at 6410 West 127th Street on May 6, 2008, and implicated two co-conspirators. Malukaite identified one of the robbers, Robber B, by photograph and by name. Malukaite also advised that she only knew Robber A to be "ALP".

9. MALULAITE stated that on the day of the robbery, she drove her red Jetta Volkswagen to the area of the bank, and met Robber A and Robber B. She waited for Robber A and Robber B on 126th Place near Ridgeland Avenue. Moments after the robbery, Robber A and Robber B ran from the bank to the area between Witness A's residence and an adjacent residence before entering Malukaite's vehicle. Robber A carried a long gun, described by Malukaite as a replica shotgun, and Robber B carried a revolver handgun. Malukaite then drove Robber A and Robber B to a house she understood to be Robber A's residence. Once inside the residence, she and the robbers counted the proceeds from the robbery. Malukaite said she believed they counted closed to \$200,000. Although Robber A and Robber B had previously agreed to pay Malukaite \$10,000 for her participation in the robbery, they gave her \$1,000 and stated that they would pay her the rest later. Recovered in Malukaite's vehicle, the red Jetta Volkswagen was \$985.00 in U.S. Currency she said was part of the money Robber A and Robber B gave her from the TCF bank robbery proceeds.

¹ On May 9, 2008, under case number 08 CR 374, Malukaite was charged with bank robbery in a criminal complaint.

10. Malukaite later informed law enforcement that the house where she and the robbers counted the bank robbery proceeds was not the house she initially identified but rather was 8732 Tulley Avenue, Oak Lawn, Illinois, which she identified as Robber A's house.

Identification of Robber A, AHMAD ALI AHMAD

11. In addition to her previous identification of Robber B by photograph, Malukaite also positively identified a photograph of Robber A. The photograph was a State of Illinois Driver's License image of AHMAD ALI AHMAD.

12. Malukaite stated that following the bank robbery, she, AHMAD, and Robber B entered AHMAD's residence at 8732 Tulley Avenue, Oak Lawn, Illinois, went to the basement area, and counted the money from the bank robbery. Malukaite stated that the three of them stacked the money in a closet, put the handgun under a mattress, and left the replica shotgun next to a pile of clothes. Malukaite also stated AHMAD and Robber B removed the clothes they wore during the bank robbery and placed them in the corner of the room. After counting the money, Malukaite, AHMAD, and Robber B drove to a public area known as the "Pavilion" in Oak Lawn. On the way there, Malukaite called her boyfriend, Individual A, and told him about the robbery. Malukaite stated that AHMAD, Robber B, and Individual A are good friends.

13. Individual A agreed to meet them at the "Pavilion." While at the "Pavilion", Malukaite, AHMAD, and Robber B, bragged about the robbery to Individual A, and numerous other friends who came to the "Pavilion." The group also spoke about the possibility of using the bank robbery proceeds to go on a vacation. AHMAD and Robber B then left the "Pavilion".

14. Malukaite related to law enforcement that on May 7, 2008, prior to being arrested, she was at a gas station and encountered Individual B, the brother of AHMAD.

Malukaite asked if Individual B knew of AHMAD's whereabouts. Individual B related to Malukaite that AHMAD was preparing to drive to Miami.

15. According to Malukaite, she telephoned AHMAD and he told her to come to Miami to meet with him and others. AHMAD told Malukaite to bring nothing because he was going to take care of everything. AHMAD told Malukaite that he would be driving to Miami but that she should just fly. Malukaite then arranged for air travel to Miami for herself and Individual A.

16. Malukaite and Individual A were scheduled to depart for Miami on May 8, 2008. Malukaite provided the FBI agents with their flight itinerary. FBI agents located Individuals A, C, and D, at the O'Hare Airport, each of whom Malukaite identified as being present at the "Pavilion" on May 06, 2008.

17. On May 8, 2008, at 4:33 p.m. while surveilling the residence at 8732 Tulley Avenue, Oak Lawn, Illinois, FBI agents observed a green Mercedes, Illinois license plate X420590, depart with one adult female and one adolescent female inside. An Illinois database query revealed that this vehicle is registered to an individual named Ali S. AHMAD.

Search of 9732 Tulley Avenue, Oaklawn

18. On May 08, 2008, a federal search warrant was granted by the Honorable Nan Noland, in this District, for the premises located at 8732 Tulley Avenue, Oaklawn, Illinois. On same date, at approximately 8:45 p.m., the search warrant was executed.

19. Agents recovered approximately \$15,000 in United States currency in various concealed locations throughout the house to include the basement, and a bedroom located on the first floor of the residence. Some of the currency was wrapped in money straps dated May 06, 2008. The money straps were inscribed with initials which appeared to be handwritten. FBI agents confirmed with employees of TCF Bank that the money straps were the type of straps used at the TCF branch at 6410 West 127th Street, Palos Heights, Illinois. FBI agents also confirmed with TCF employees that the initials were written by

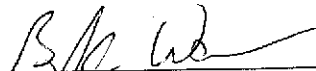
TCF bank personnel at that bank. Additionally, FBI agents recovered five rounds of .38 caliber ammunition under a mattress in the basement, which appeared to be ammunition consistent with the weapon carried by Robber B.

20. Agents interviewed the father of AHMAD ALI AHMAD, who resides at 8732 Tulley Avenue. AHMAD's father stated that his son AHMAD resides at this residence. AHMAD sleeps in the basement area of the home. AHMAD's father further stated that his family, including AHMAD, recently moved to 8732 Tulley Avenue from 9100 Parkside Avenue in Oaklawn.

21. On May 9, 2008, FBI Miami and the Miami Beach Police Department law enforcement officers confirmed that May 8, 2008, the Royal Palm Hotel in Miami Beach rented two rooms to a guest by the name AHMAD ALI AHMAD, who gave an address of 9100 Parkside Avenue, Oak Lawn, Illinois. The address of 9100 Parkside Avenue is the address listed on AHMAD's State of Illinois Driver's license, and the signature in the hotel's register appears to match the signature on his driver's license. The rooms were paid for in cash in the amount of \$4,000. AHMAD was scheduled to check out on Monday, May 12, 2008.

20. Based on the above information, I believe there is probable cause to believe that AHMAD ALI AHMAD did, by force, violence or intimidation, take from the person and presence of bank employees, approximately \$170,000 in United States Currency belonging to and in the care, custody, control, management, and possession of the TCF Bank branch office located at 6410 West 127th Street, Palos Heights, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113 (a) and (2).

FURTHER AFFIANT SAYETH NOT.



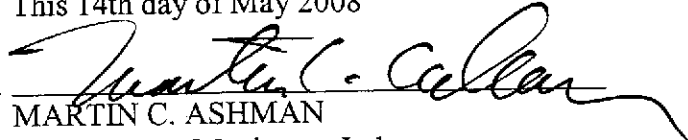
BRYAN K. WATSON

Special Agent

Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME

This 14th day of May 2008



MARTIN C. ASHMAN

United States Magistrate Judge